

**THE CITY OF NEW YORK
LAW DEPARTMENT**

JAMES E. JOHNSON
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July 7, 2020

Via First-Class Mail

Mushtaq Ahmad
Plaintiff *Pro Se*
10 Parliament Drive
New City, New York 10956

Re: Mushtaq Ahmad v. New York City Department of Education et al.
Civil Action No.: 18-CV-03494 (WFK) (LB)
Law Dept. No.: 2018-060388

Dear Mr. Ahmad:

I am an Assistant Corporation Counsel in the Office of James E. Johnson, Corporation Counsel of the City of New York, attorney for Defendants, the New York City Department of Education ("DOE"), former Chancellor Carmen Fariña, Superintendent Michael Prayor, James Olearchik, Emilie Mittiga, Catrina Williams, Cedric Hall, Benjamin Grossman, Katherine G. Rodi, Kelly Houston, and Julia Findley (collectively, "DOE Defendants"), in the above-referenced *pro se* matter. Enclosed please find a copy of DOE Defendants' Reply in Further Support of Their Unopposed Motion to Dismiss the Complaint (Docket Entry No. 56). Please also find a copy of the cover letter enclosed with the Courtesy Copies mailed to Chambers on July 7, 2020.

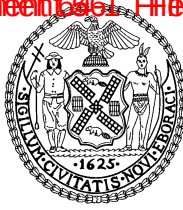
If you have any questions, please direct them to the *Pro Se* Office.

Sincerely,

/s/

Brittany J. Finder
Assistant Corporation Counsel

cc: Michael J. Del Piano (by ECF) (without enclosures)
New York State United Teachers Office of General Counsel
Attorney for Defendants United Federation of Teachers and
New York State United Teachers-NYSUT
52 Broadway 9th Floor
New York, New York 10004



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July 7, 2020

Via ECF

Honorable William F. Kuntz, II
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Mushtaq Ahmad v. New York City Department of Education et al.
Civil Action No.: 18-CV-03494 (WFK) (LB)
Law Dept. No.: 2018-060388

Dear Judge Kuntz:

I am an Assistant Corporation Counsel in the Office of James E. Johnson, Corporation Counsel of the City of New York, attorney for Defendants, the New York City Department of Education (“DOE”), former Chancellor Carmen Fariña, Superintendent Michael Prayor, James Olearchik, Emilie Mittiga, Catrina Williams, Cedric Hall, Benjamin Grossman, Katherine G. Rodi, Kelly Houston, and Julia Findley (collectively, “DOE Defendants”), in the above-referenced *pro se* matter. I write concerning a motion to dismiss which DOE Defendants served on the *Pro Se* Plaintiff.

On March 15, 2019, in accord with the briefing schedule approved by the Court on January 14, 2019, and the Court’s Bundling Rule, DOE Defendants served the *Pro Se* Plaintiff, at the postal address he designated, with DOE Defendants’ (1) Notice of Motion; (2) Local Rule 12.1 Notice to *Pro Se* Plaintiff; (3) Declaration of Assistant Corporation Counsel Brittany J. Finder in Support of DOE Defendants’ Motion to Dismiss the Complaint and annexed exhibits; (4) Memorandum of Law in Support of DOE Defendants’ Motion to Dismiss the Complaint; and (5) copies of the unpublished cases cited in DOE Defendants’ memorandum. *See* Docket Entry No. 35.

In accord with the Court’s Order of March 26, 2020, Plaintiff was to serve his opposition to DOE Defendants’ motion by June 26, 2020. As of this date, DOE Defendants have not received any opposition papers. Consequently, DOE Defendants have filed an unopposed motion to dismiss.

I thank the Court for its attention to this matter.

Respectfully submitted,

/s/

Brittany J. Finder

Assistant Corporation Counsel

cc: Mushtaq Ahmad (by ECF and First Class Mail)
Plaintiff *Pro Se*
10 Parliament Drive
New City, New York 10956

Michael J. Del Piano (by ECF)
New York State United Teachers Office of General Counsel
Attorney for Defendants United Federation of Teachers and
New York State United Teachers-NYSUT
52 Broadway 9th Floor
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July 7, 2020

Via Overnight Mail

Honorable William F. Kuntz, II
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Mushtaq Ahmad v. New York City Department of Education et al.
Civil Action No.: 18-CV-03494 (WFK) (LB)
Law Dept. No.: 2018-060388

Dear Judge Kuntz:

I am an Assistant Corporation Counsel in the Office of James E. Johnson, Corporation Counsel of the City of New York, attorney for Defendants, the New York City Department of Education (“DOE”), former Chancellor Carmen Fariña, Superintendent Michael Prayor, James Olearchik, Emilie Mittiga, Catrina Williams, Cedric Hall, Benjamin Grossman, Katherine G. Rodi, Kelly Houston, and Julia Findley (collectively, “DOE Defendants”), in the above-referenced *pro se* matter. In accord with Your Honor’s Individual Motion Practices and Rules, I write to submit Courtesy Copies of the following motion papers, filed via ECF on July 7, 2020:

- (1) Notice of Motion and Local Rule 12.1 Notice to *Pro Se* Plaintiff (Docket Entry No. 53);
- (2) Declaration of Assistant Corporation Counsel Brittany J. Finder in Support of DOE Defendants’ Motion to Dismiss the Complaint and annexed Exhibits A, B, and C (Docket Entry No. 54);
- (3) Memorandum of Law in Support of DOE Defendants’ Motion to Dismiss the Complaint (Docket Entry No. 55); and
- (4) Reply in Further Support of DOE Defendants’ Unopposed Motion to Dismiss the Complaint (Docket Entry No. 56)

I thank the Court for its attention to this matter.

Respectfully submitted,

/s/

Brittany J. Finder

Assistant Corporation Counsel

cc: Mushtaq Ahmad (by First Class Mail) (without enclosures)
Plaintiff *Pro Se*
10 Parliament Drive
New City, New York 10956

Michael J. Del Piano (by E-Mail) (without enclosures)
New York State United Teachers Office of General Counsel
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